

# Exhibit D

**FEE APPLICATION PREPARATION TOTALS**

Law Firm	Time (hrs)	Total Billing
Anderson Kill, P.C.	20.50	\$12,922.50
Motley Rice, LLC	44.00	\$33,000.00
<b>TOTAL</b>	<b>64.50</b>	<b>\$45,922.50</b>

# **Motley Rice, LLC**

**MOTLEY RICE, LLC**

Date	Attorney	Description	Time (hrs)	Rate	Charge
01/06/2014	Haefele, Robert T.	Draft fee application	3.00	\$750.00	\$2,250.00
01/07/2014	Haefele, Robert T.	Draft fee application	5.00	\$750.00	\$3,750.00
01/08/2014	Haefele, Robert T.	Draft fee application	4.50	\$750.00	\$3,375.00
01/09/2014	Haefele, Robert T.	Draft fee application	5.00	\$750.00	\$3,750.00
01/20/2014	Haefele, Robert T.	Additional legal research, drafting and editing of Fee Petition; emails to PEC members to follow up for needed supporting materials.	5.00	\$750.00	\$3,750.00
01/21/2014	Haefele, Robert T.	Additional legal research re NY billing rates (.50), drafting and editing of Fee Petition (3.5); Prep and Review of MR bios (.30) emails to PEC members to follow up for needed supporting materials (.20).	4.50	\$750.00	\$3,375.00
01/22/2014	Haefele, Robert T.	Additional drafting and revising/editing of Fee Petition (4.0); emails to PEC members to follow up for needed supporting materials and oversee collecting/organizing billing and fees support (.75).	4.75	\$750.00	\$3,562.50
01/23/2014	Haefele, Robert T.	Edits to Fee Application; Coordinate with PEC members; circulate draft of Fee Application for Comment; Coordinate revisions based on comments.	5.25	\$750.00	\$3,937.50
01/24/2014	Haefele, Robert T.	Edits to Fee application; incorporate comments; draft certification; cite check; oversee/coordinate prep of exhibits.	7.00	\$750.00	\$5,250.00
		<b>TOTAL</b>	<b>44.00</b>		<b>\$33,000.00</b>

**Anderson Kill, P.C.**

**ANDERSON KILL, P.C.**

Date	Attorney	Description	Time (hrs)	Rate	Charge
12/27/2013	Goldman, Jerry S.	Work on fee application (AHIF)	2.60	\$800.00	\$2,080.00
12/29/2013	Goldman, Jerry S.	Email to Scott T.; email to team re: projects. (Allocate to AHIF).	0.20	\$800.00	\$160.00
12/29/2013	Goldman, Jerry S.	Fee application work continued.	1.40	\$800.00	\$1,120.00
12/30/2013	Goldman, Jerry S.	Receive and review materials from Scott T.; reply; received and review materials from Scott T.; reply. (Allocate to AHIF).	0.20	\$800.00	\$160.00
12/31/2013	Goldman, Jerry S.	Call with associate re: drafting.	0.30	\$800.00	\$240.00
12/31/2013	Goldman, Jerry S.	Work on fee petition - continued.	1.90	\$800.00	\$1,520.00
12/31/2013	Hertzog, Rene F.	Read discovery decision allowing for award of attorneys' fees. Reviewed draft papers for recovery of attorneys' fees. Discussed legal research needed for attorneys' fees motion with J. Goldman and began same.	2.70	\$475.00	\$1,282.50
01/02/2014	Goldman, Jerry S.	Work on fee application issues.	0.70	\$800.00	\$560.00
01/06/2014	Goldman, Jerry S.	Work on fee petition; call with Scott T.	1.40	\$800.00	\$1,120.00
01/06/2014	Hertzog, Rene F.	Researched law in Second Circuit on calculation of reasonable attorneys' fees for fee application relating to discovery sanction order.	4.20	\$475.00	\$1,995.00
01/07/2014	Goldman, Jerry S.	Fee petition work - received and review communications RH - review data - continued - communicate with associate re: law.	0.90	\$800.00	\$720.00
01/07/2014	Hertzog, Rene F.	Continued researching case law on calculation of reasonable attorneys' fees. Began drafting memo of law on same. Discussed with J. Goldman and email correspondence with team and PEC regarding form of papers for fee application.	3.80	\$475.00	\$1,805.00
01/08/2014	Goldman, Jerry S.	Communications with associate re: legal issues in fee petition - AHIF.	0.20	\$800.00	\$160.00
		<b>TOTAL</b>	<b>20.50</b>		<b>\$12,922.50</b>